#### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND Greenbelt Division

JAMES L. WILLIAMS, et al.	)
Plaintiffs,	) )
v.	) Civil Action 8:16-cv-00058-PX
CORELOGIC RENTAL PROPERTY	<u> </u>
SOLUTIONS, LLC	)
Defendant.	)

# CONSENT MOTION TO MODIFY SCHEDULING ORDER AND DISCOVERY ORDER

Plaintiffs, James L. Williams and Hector Hernandez ("Plaintiffs"), and Defendant, CoreLogic Rental Property Solutions, LLC ("RPS"), through their counsel, respectfully request that this Court modify its August 4, 2016 Scheduling Order (Dkt. No. 44). Plaintiffs and Defendant are currently negotiating the production of Defendant's database information as set forth in the consent order (Dkt No. 78), and Defendant is in the process of producing the documents that the Court ordered produced in its October 26, 2016 order. (Dkt. No. 80.) The Parties have been diligently taking and exchanging discovery but are in agreement that additional time is needed to conduct discovery, including expert analysis regarding Defendant's databases. The Parties request that the Court modify current schedule as follows:

	Prior Deadline	Requested Deadline
Plaintiffs' and Defendant's Rule 26(a)(2) expert disclosures	November 8, 2016	January 20, 2017
Plaintiffs' and Defendant's Rule 26(a)(2) expert rebuttal disclosures	December 6, 2016	February 16, 2017
Rule 26(e)(2) supplementation of disclosures and responses	December 13, 2016	February 23, 2017

Discovery deadline; submission	December 21, 2017	March 1, 2017
of status report		
Requests for Admission	January 11, 2017	March 14, 2017
Dispositive pretrial motions deadline	January 31, 2017	April 19, 2017
Motion for class certification deadline	January 31, 2017	April 19, 2017

Upon submission of the request for a pre-motion conference with respect to a motion for class certification and/or motion for summary judgment, the parties request that the Court hold a status conference to establish a briefing schedule for the resolution of the motion(s).

Unless modified herein, the provisions contained in the initial April 6, 2016 Order and August 4, 2016 Order shall remain in effect.

WHEREFORE, for the above-stated reasons, counsel for all parties respectfully request that the current Scheduling Order issued by the Court be modified as set forth above.

# JAMES L. WILLIAMS and HECTOR HENANDEZ

#### /s/ Kristi Cahoon Kelly

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of November, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to all counsel of record.

## /s/ Kristi Cahoon Kelly

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